

Mr. David Brayton
Colwell/General, Inc.
P.O. Box 218
Kendallville, Indiana 46755-0218

Re: **113-11506**
First Administrative Amendment to
Part 70 113-6020-00019

Dear Mr. Brayton:

Colwell/General, Inc. was issued a Part 70 Operating permit on October 6, 1998, for a paint chip and stripe card manufacturing operation. Letters requesting to add two (2) additional coating lines each consisting of a roll coater and curing oven, and a new thermal oxidizer to their existing plant was received on May 20, 1999 and July 2, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

1. Section A is revised to read as shown below. Note that the PSD source status was incorrectly listed as minor in the original Part 70 permit but has been corrected here.

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a **stationary** paper coating and offset printing presses **operation** producing paint chips and stripe cards.

Responsible Official:	David Brayton
Source Address:	231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address:	P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number:	219-347-1981
SIC Code:	2752
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program
	Minor Major Source, under PSD Rules;
	Major Source, Part 70 Permit Program Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) paper coating line, S-1, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;
- (2) one (1) paper coating line, S-3, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (3) one (1) paper coating line, S-2, with a maximum throughput of 432 pounds of coating per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; ~~and~~
- (4) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (5) **one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;**
- (6) **one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and**
- (7) **one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) **It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).**

2. Section D.1 is revised to read as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) one (1) paper coating line, S-1, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;**
- (2) one (1) paper coating line, S-3, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;**
- (3) one (1) paper coating line, S-2, with a maximum throughput of 432 pounds of coating per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and**
- (4) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and**
- (5) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.**
- (b) When operating the thermal oxidizer (TO-1) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum ~~90.3~~ **94.0**% overall efficiency. This efficiency is required by the rule 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2 (c) and the overall control efficiency of ~~90.3~~ **94.0**%, the VOC content of the coating shall not exceed 18.1 pounds per gallon of coating solids delivered to the applicator.**

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 81.96 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the rollcoating paper coating application system, CC-1, shall be limited to 165 and 400 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, TO-1, that maintains a minimum overall control efficiency of 94.0%. These limits shall render the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.25 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

During the period between 0 and 6 months after issuance of this permit, The Permittee shall perform VOC testing on the 9.4 MM Btu/hr thermal oxidizer, TO-1, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve ~~90.3~~ **94.0%** overall efficiency for this incinerator. ~~This test shall be repeated at least once every~~ **Since the initial test required by this permit was performed within 6 months after issuance of this permit, this test shall not be required until** five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.36 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC)

The thermal oxidizer, TO-1, shall be in operation at all times when any of the paper coating lines (S-1, S-2, S-3, or CC-1) or the can washing line is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.48 Volatile Organic Compound Control

~~The thermal oxidizer, TO-1, shall be in operation at all times when any of the paper coating lines or the can washing line is in operation.~~ When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1400°F or a temperature, fan amperage, and duct velocity determined in the most recent compliance stack tests to maintain at least ~~90.3~~ **94.0**% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-2-5 satisfied.

~~D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)] [326 IAC 1-6-3]~~

~~A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.~~

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in ~~this section~~ **condition D.1.1**. The records shall contain, as a minimum, the following information:
- ~~(a)~~(1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
 - ~~(b)~~(2) The VOC content (weight and volume percent) of each material used.
 - ~~(c)~~(3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
 - ~~(d)~~(4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.
 - ~~(e)~~(5) Operational parameters of the VOC emission control equipment, such as:
 - ~~(1)~~(i) Capture efficiency;
 - ~~(2)~~(ii) Destruction (or removal) efficiency;
 - ~~(3)~~(iii) Data used to establish the capture and destruction (or removal) efficiencies; and
 - ~~(4)~~(iv) Temperature readings.
- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall also maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits for the CC-1 coating line established in Conditions D.1.2 and D.1.3.

- (1) The amount, the VOC content, and the HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC and HAP content of the coatings used for each month;
- (4) The cleanup solvent usage for each month;
- (5) The total VOC and HAP usage for each month; and
- (6) The weight of VOCs and HAPs emitted for each compliance period.

D.1.710 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions ~~D.1.1~~ **D.1.2 and D.1.3** shall be submitted to the address listed in Section C - General Reporting Requirements, **of this permit**, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

3. A new section D.2 has been added to the Part 70 permit for coating line S-4 and the new thermal oxidizer (TO-2). The new section D.2 now reads as follows:

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (6) one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and
- (7) one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) When operating the thermal oxidizer (TO-2) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95.0% overall efficiency. This efficiency exceeds the minimum overall control efficiency required by the rule 326 IAC 8-1-2 (a)(2).

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as S-4, shall be limited to 681.62 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-2, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new rollcoating paper coating application system, identified as S-4, shall be any one or combination of the following:

- (a) At least 95 percent overall organic HAP control efficiency (capture and control) using an add-on control device for emissions from a coating line, as calculated over a calendar month; or
- (b) no more than 0.20 kg HAP applied per kg coating solids applied, as calculated on a weighted average basis for each calendar month for all coatings used; or
- (c) no more than 0.20 kg HAP emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

This source will use the thermal oxidizer, identified as TO-2, to comply with paragraph (a) of this condition.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

To demonstrate compliance with the minimum 95% overall control efficiency required by condition D.2.1, during the period between 0 and 6 months after issuance of Significant Source Modification No. 113-11120-00019, the Permittee shall perform VOC testing on the thermal oxidizer, TO-2, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance. Compliance with this condition can coincide with compliance with condition D.2.8.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limit contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 Volatile Organic Compounds (VOC)

The thermal oxidizer, TO-2, shall be in operation at all times when the paper coating line (S-4) is in operation.

D.2.8 New Source Toxics Control [326 IAC 2-4.1-1]

To demonstrate compliance with the 95% overall organic HAP control efficiency requirement in Condition D.2.3(a), the Permittee shall follow the procedures in either paragraph (a) or (b) of this condition:

- (a) Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters by following the procedures listed below:
 - (1) An initial performance test to establish the destruction efficiency (E) and the associated combustion zone temperature for the thermal oxidizer TO-2 shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.
 - (iii) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.
 - (iv) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

- (v) **Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.**
- (vi) **Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (A) to (C) below. The Permittee shall submit notice of the intended test method to IDEM, OAM for approval along with notice of the performance test that conforms to the schedule and procedures in 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR Part 60, Appendix A, if:**

 - (A) **An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.2.3(a): or**
 - (B) **The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or**
 - (C) **Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.**
- (vii) **Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.**
- (viii) **Organic volatile matter mass flow rates shall be determined using Equation 20 in 40 CFR 63.828 (Subpart KK). A copy of Subpart KK is included with this permit.**
- (ix) **Emission control device efficiency shall be determined using Equation 21 in 40 CFR 63.828 (Subpart KK).**
- (x) **The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.**
- (xi) **For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. The Permittee shall establish as the operating parameter the minimum combustion temperature.**

- (2) A performance test to determine the capture efficiency (F) of the capture system venting organic emissions to the thermal oxidizer TO-2 shall be conducted in accordance with the following:
- (i) For a permanent total enclosure, capture efficiency shall be assumed as 100 percent. Procedure T--Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in appendix B to 40 CFR 52.741 shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.
 - (ii) For other than a permanent total enclosure, the capture efficiency shall be determined according to the protocol specified in 40 CFR 52.741(a)(4)(iii)(B).
 - (iii) As an alternative, the Permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of 40 CFR Part 63, Subpart KK, the Printing and Publishing Industry NESHAP.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:
- $$R = E \cdot F / 100$$
- (4) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with the procedures in Condition D.2.10 whenever the coating line S-4 is operating.
- (5) The affected source is in compliance if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with Condition D.2.10(a) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with Condition D.2.10(b) for each three hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.
- (b) As an alternative to the procedures in paragraph (a) of this condition, the Permittee may use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site-specific operating parameter to assure capture efficiency. Compliance shall be demonstrated by following the procedures listed below:

- (1) Install continuous emission monitors to determine the total organic volatile matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter, and the volumetric flow rate in cubic meters per second, such that the total organic volatile matter mass flow rate in grams per second can be calculated and summed) at both the inlet to and the outlet from the control device, such that the percent control efficiency (E) of the control device can be calculated for each month.
- (2) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with the procedures in Condition D.2.10(b) whenever the S-4 coating line is operated.
- (3) Determine the capture efficiency (F) in accordance with the procedures in paragraph (a)(2) of this condition.
- (4) Calculate the overall organic HAP control efficiency, (R), achieved for each month using the equation in paragraph (a)(3) of this condition.
- (5) The affected source is in compliance if the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with for each three hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Volatile Organic Compound Control

When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1300°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-2-5 satisfied.

D.2.10 New Source Toxics Control [326 IAC 2-4.1-1]

Following the date on which the initial performance test of the thermal oxidizer TO-2 is completed, to demonstrate continuing compliance with Condition D.2.3(a), the Permittee shall monitor and inspect the oxidizer to ensure proper operation and maintenance by implementing the following:

- (a) Install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/-1 percent of the temperature being monitored in degrees Celsius or +/-1 degrees Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (b) Monitor an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained. The Permittee shall:
 - (1) Submit to IDEM, OAM a plan that:

- (i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
 - (ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance; and
 - (iii) Identifies the specific monitoring procedures;
- (2) Set the operating parameter value, or range of values, that demonstrate compliance with Condition D.2.3(a), and
- (3) Conduct monitoring in accordance with the plan submitted to IDEM, OAM unless comments received from IDEM, OAM require an alternate monitoring scheme.
- (c) Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a) and (b) of this condition, unless otherwise excused, shall be considered a violation of the emission standard in Condition D.2.3(a).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

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- (a) The Permittee shall maintain records of the materials used that contain any VOCs or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in conditions D.2.1, and D.2.2, and D.2.3. The records shall contain, as a minimum, the following information:
 - (1) The weight of VOC-containing and HAP-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
 - (2) The VOC and HAP content (weight and volume percent) of each material used.
 - (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
 - (4) VOC and HAP control device and capture system operating parameter data for each month, such as:
 - (i) Capture efficiency;
 - (ii) Destruction (or removal) efficiency;
 - (iii) Data used to establish the capture and destruction (or removal) efficiencies; and

(iv) Temperature readings.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

4. The report form for the limit pursuant to 326 IAC 8-2-5 included in the original Part 70 permit has been removed through this Significant Source Modification because it was determined that reporting is not necessary to demonstrate compliance with 326 IAC 8-2-5. Two new report forms are now included in the Part 70 permit to document compliance with the VOC and HAP usage limits in conditions D.1.2, D.1.3, and D.2.2. The forms now read as follows:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system CC-1
Parameter: VOC
Limit: The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 81.96 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system CC-1
Parameter: Single HAP and Total HAP
Limit: The total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the rollcoating paper coating application system, CC-1, shall be limited to 165 and 400 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, TO-1, that maintains a minimum overall control efficiency of 94.0%.

YEAR: _____

Month	Worst-Case Single HAP Usage This Month (tons)	Total HAP Usage This Month (tons)	Worst-Case Single HAP Usage Previous 11 Months (tons)	Total HAP Usage Previous 11 Months (tons)	12 Month Worst-Case Single HAP Usage (tons)	12 Month Total HAP Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system S-4
Parameter: VOC
Limit: The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as S-4, shall be limited to 681.62 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-2, that maintains a minimum overall control efficiency of 95.0%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Trish Earls, at 973-575-2555, ext. 3219, or call (800) 451-6027, press 0 and ask for extension 3-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
TE/EVP

cc: File - Noble County
U.S. EPA, Region V
Noble County Health Department
Air Compliance Section Inspector Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Colwell/General, Inc.
231 South Progress Drive East
Kendallville, Indiana 46755**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-6020-00019	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: October 6, 1998
First Administrative Amendment: 113-11506	Pages Affected: 3, 3a, 4, 4a, 26, 27, 27a-27g, 31, 31a, 31b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

C.9 Performance Testing [326 IAC 3-6]

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

- C.10 Compliance Schedule [326 IAC 2-7-6(3)]
- C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
- C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]
- C.13 Monitoring Methods [326 IAC 3]
- C.14 Pressure Gauge Specifications

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
- C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
- C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5]
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)]
- C.20 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
- C.21 General Record Keeping Requirements [326 IAC 2-7-5(3)]
- C.22 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

- C.23 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - four (4) paper coating lines, S-1, S-3, S-2, and CC-1, and one (1) can washing line 26

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
- D.1.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]
- D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 Volatile Organic Compounds (VOC)

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.1.8 Volatile Organic Compound Control

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.9 Record Keeping Requirements
- D.1.10 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - one (1) paper coating line, S-4 27b

Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]
- D.2.2 PSD Minor Limit [326 IAC 2-2][40 CFR 52.21]
- D.2.3 New Source Toxics Control [326 IAC 2-4.1-1]
- D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
- D.2.6 Volatile Organic Compounds (VOC)

- D.2.7 Volatile Organic Compounds (VOC)
- D.2.8 New Source Toxics Control [326 IAC 2-4.1-1]

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.2.9 Volatile Organic Compound Control
- D.2.10 New Source Toxics Control [326 IAC 2-4.1-1]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.11 Record Keeping Requirements
- D.2.12 Reporting Requirements

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary paper coating and offset printing presses operation producing paint chips and stripe cards.

Responsible Official: David Brayton
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Phone Number: 219-347-1981
SIC Code: 2752
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Major Source, under PSD Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) one (1) paper coating line, S-1, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;
- (2) one (1) paper coating line, S-3, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (3) one (1) paper coating line, S-2, with a maximum throughput of 432 pounds of coating per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (4) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and
- (5) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1;
- (6) one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and

- (7) one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source does not currently have any insignificant activities, as defined in 326 IAC 2-7-1 (21) that have applicable requirements.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (1) one (1) paper coating line, S-1, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by direct flame incinerator, TO-1, (capacity details listed under insignificant activity (1)), then exhausted at Stack/Vent ID #S1;
- (2) one (1) paper coating line, S-3, with a maximum throughput of 35 gallons of coatings per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (3) one (1) paper coating line, S-2, with a maximum throughput of 432 pounds of coating per hour. Emissions shall be controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1;
- (4) one (1) enclosed can washer with recirculating solvent, with suspended VOC exhausted to and controlled by a thermal oxidizer, TO-1, then exhausted at Stack/Vent ID #S1; and
- (5) one (1) curing oven and rollcoating paper coating application system, identified as CC-1, equipped with one (1) 1.35 million (MM) British thermal units (Btu) per hour, natural gas-fired burner for the curing oven, with a maximum throughput of 36 pounds of coating per hour to coat a maximum of 41.8 pounds of paper per hour, with VOC emissions controlled by an existing thermal oxidizer, identified as TO-1, exhausting through one (1) stack, identified as #S1.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) When operating the thermal oxidizer (TO-1) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 94.0% overall efficiency. This efficiency is required by the rule 326 IAC 8-1-2 (a)(2). Based upon 326 IAC 8-1-2 (c) and the overall control efficiency of 94.0%, the VOC content of the coating shall not exceed 18.1 pounds per gallon of coating solids delivered to the applicator.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 81.96 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.1.3 Hazardous Air Pollutants (HAPs) [326 IAC 2-4.1-1]

The total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the rollcoating paper coating application system, CC-1, shall be limited to 165 and 400 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, TO-1, that maintains a minimum overall control efficiency of 94.0%. These limits shall render the requirements of 326 IAC 2-4.1-1 (New Source Toxics Control) not applicable.

D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee shall perform VOC testing on the 9.4 MM Btu/hr thermal oxidizer, TO-1, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 94.0% overall efficiency for this incinerator. Since the initial test required by this permit was performed within 6 months after issuance of this permit, this test shall not be required until five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.1.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Volatile Organic Compounds (VOC)

The thermal oxidizer, TO-1, shall be in operation at all times when any of the paper coating lines (S-1, S-2, S-3, or CC-1) or the can washing line is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Volatile Organic Compound Control

When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1400°F or a temperature, fan amperage, and duct velocity determined in the most recent compliance stack tests to maintain at least 94.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-2-5 satisfied.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.9 Record Keeping Requirements

(a) The Permittee shall maintain records of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in condition D.1.1. The records shall contain, as a minimum, the following information:

- (1) The weight of VOC-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
- (2) The VOC content (weight and volume percent) of each material used.

- (3) The weight of VOCs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
- (4) Operational parameters of the VOC emission control equipment, considering capture and destruction (or removal) efficiency.
- (5) Operational parameters of the VOC emission control equipment, such as:
 - (i) Capture efficiency;
 - (ii) Destruction (or removal) efficiency;
 - (iii) Data used to establish the capture and destruction (or removal) efficiencies; and
 - (iv) Temperature readings.
- (b) To document compliance with Conditions D.1.2 and D.1.3, the Permittee shall also maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits for the CC-1 coating line established in Conditions D.1.2 and D.1.3.
 - (1) The amount, the VOC content, and the HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC and HAP content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC and HAP usage for each month; and
 - (6) The weight of VOCs and HAPs emitted for each compliance period.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (6) one (1) curing oven and rollcoating paper coating application system, identified as S-4, with a maximum throughput of 425 pounds of coating per hour to coat a maximum of 1,079 pounds of paper per hour, with VOC emissions controlled by a new thermal oxidizer, identified as TO-2, exhausting through one (1) stack, identified as #TO-2; and
- (7) one (1) thermal oxidizer, identified as TO-2, using natural gas as a supplementary fuel at a maximum heat input rate of 3.0 million (MM) British thermal units (Btu) per hour, exhausting through one (1) stack, identified as #TO-2. The curing oven on the S-4 coating line is powered through heat recovery from this thermal oxidizer.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), no owner or operator of a coating line subject to this section may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of two and nine-tenths (2.9) pounds per gallon excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (b) When operating the thermal oxidizer (TO-2) to achieve the limit for rule 326 IAC 8-2-5, 2.9 pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer shall maintain a minimum 95.0% overall efficiency. This efficiency exceeds the minimum overall control efficiency required by the rule 326 IAC 8-1-2 (a)(2).

D.2.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as S-4, shall be limited to 681.62 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-2, that maintains a minimum overall control efficiency of 95.0%. This limit will render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

D.2.3 New Source Toxics Control [326 IAC 2-4.1-1]

Pursuant to the MACT determination under 326 IAC 2-4.1-1, operating conditions for the new rollcoating paper coating application system, identified as S-4, shall be any one or combination of the following:

- (a) At least 95 percent overall organic HAP control efficiency (capture and control) using an add-on control device for emissions from a coating line, as calculated over a calendar month; or
- (b) no more than 0.20 kg HAP applied per kg coating solids applied, as calculated on a weighted average basis for each calendar month for all coatings used; or
- (c) no more than 0.20 kg HAP emitted per kg coating solids applied, as calculated on a weighted average basis for all coatings used each calendar month.

This source will use the thermal oxidizer, identified as TO-2, to comply with paragraph (a) of this condition.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

To demonstrate compliance with the minimum 95% overall control efficiency required by condition D.2.1, during the period between 0 and 6 months after issuance of Significant Source Modification No. 113-11120-00019, the Permittee shall perform VOC testing on the thermal oxidizer, TO-2, by a method approved by the Commissioner, to determine the minimum operating temperature that will achieve 95.0% overall efficiency for this oxidizer. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. In addition to these requirements, IDEM may require compliance testing when necessary to determine if the facility is in compliance. Compliance with this condition can coincide with compliance with condition D.2.8.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content limit contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 Volatile Organic Compounds (VOC)

The thermal oxidizer, TO-2, shall be in operation at all times when the paper coating line (S-4) is in operation.

D.2.8 New Source Toxics Control [326 IAC 2-4.1-1]

To demonstrate compliance with the 95% overall organic HAP control efficiency requirement in Condition D.2.3(a), the Permittee shall follow the procedures in either paragraph (a) or (b) of this condition:

- (a) Demonstrate initial compliance through performance tests of capture efficiency and control device efficiency and continuing compliance through continuous monitoring of capture system and control device operating parameters by following the procedures listed below:
 - (1) An initial performance test to establish the destruction efficiency (E) and the associated combustion zone temperature for the thermal oxidizer TO-2 shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.
 - (iii) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.
 - (iv) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

- (v) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.
 - (vi) Method 25 of 40 CFR part 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (A) to (C) below. The Permittee shall submit notice of the intended test method to IDEM, OAM for approval along with notice of the performance test that conforms to the schedule and procedures in 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR Part 60, Appendix A, if:
 - (A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.2.3(a): or
 - (B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or
 - (C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.
 - (vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.
 - (viii) Organic volatile matter mass flow rates shall be determined using Equation 20 in 40 CFR 63.828 (Subpart KK). A copy of Subpart KK is included with this permit.
 - (ix) Emission control device efficiency shall be determined using Equation 21 in 40 CFR 63.828 (Subpart KK).
 - (x) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.
 - (xi) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. The Permittee shall establish as the operating parameter the minimum combustion temperature.
- (2) A performance test to determine the capture efficiency (F) of the capture system venting organic emissions to the thermal oxidizer TO-2 shall be conducted in accordance with the following:

- (i) For a permanent total enclosure, capture efficiency shall be assumed as 100 percent. Procedure T--Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in appendix B to 40 CFR 52.741 shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.
 - (ii) For other than a permanent total enclosure, the capture efficiency shall be determined according to the protocol specified in 40 CFR 52.741(a)(4)(iii)(B).
 - (iii) As an alternative, the Permittee may use any capture efficiency protocol and test methods that satisfy the criteria of either the Data Quality Objective (DQO) or the Lower Confidence Limit (LCL) approach as described in Appendix A of 40 CFR Part 63, Subpart KK, the Printing and Publishing Industry NESHA.
- (3) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:
$$R = E \cdot F / 100$$
- (4) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with the procedures in Condition D.2.10 whenever the coating line S-4 is operating.
- (5) The affected source is in compliance if the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with Condition D.2.10(a) for each three-hour period, and the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with Condition D.2.10(b) for each three hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.
- (b) As an alternative to the procedures in paragraph (a) of this condition, the Permittee may use continuous emission monitors, conduct an initial performance test of capture efficiency, and continuously monitor a site-specific operating parameter to assure capture efficiency. Compliance shall be demonstrated by following the procedures listed below:
 - (1) Install continuous emission monitors to determine the total organic volatile matter mass flow rate (e.g., by determining the concentration of the vent gas in grams per cubic meter, and the volumetric flow rate in cubic meters per second, such that the total organic volatile matter mass flow rate in grams per second can be calculated and summed) at both the inlet to and the outlet from the control device, such that the percent control efficiency (E) of the control device can be calculated for each month.
 - (2) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameter established in accordance with the procedures in Condition D.2.10(b) whenever the S-4 coating line is operated.
 - (3) Determine the capture efficiency (F) in accordance with the procedures in paragraph (a)(2) of this condition.

- (4) Calculate the overall organic HAP control efficiency, (R), achieved for each month using the equation in paragraph (a)(3) of this condition.
- (5) The affected source is in compliance if the capture system operating parameter is operated at an average value greater than or less than (as appropriate) the operating parameter value established in accordance with for each three hour period, and the overall organic HAP control efficiency, R, is 95 percent or greater.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Volatile Organic Compound Control

When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1300°F or a temperature determined in the most recent compliance stack tests to maintain at least 95.0% overall control efficiency. The temperature of the burner of the thermal oxidizer shall be continuously monitored and recorded whenever any of the facilities are in operation. Compliance with this condition shall deem 326 IAC 8-2-5 satisfied.

D.2.10 New Source Toxics Control [326 IAC 2-4.1-1]

Following the date on which the initial performance test of the thermal oxidizer TO-2 is completed, to demonstrate continuing compliance with Condition D.2.3(a), the Permittee shall monitor and inspect the oxidizer to ensure proper operation and maintenance by implementing the following:

- (a) Install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of +/-1 percent of the temperature being monitored in degrees Celsius or +/-1 degrees Celsius, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (b) Monitor an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained. The Permittee shall:
 - (1) Submit to IDEM, OAM a plan that:
 - (i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
 - (ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance; and
 - (iii) Identifies the specific monitoring procedures;
 - (2) Set the operating parameter value, or range of values, that demonstrate compliance with Condition D.2.3(a), and
 - (3) Conduct monitoring in accordance with the plan submitted to IDEM, OAM unless comments received from IDEM, OAM require an alternate monitoring scheme.
- (c) Any excursion from the required operating parameters which are monitored in accordance with paragraphs (a) and (b) of this condition, unless otherwise excused, shall be considered a violation of the emission standard in Condition D.2.3(a).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.11 Record Keeping Requirements

- (a) The Permittee shall maintain records of the materials used that contain any VOCs or HAPs. The records shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in conditions D.2.1, D.2.2, and D.2.3. The records shall contain, as a minimum, the following information:
- (1) The weight of VOC-containing and HAP-containing material used, including purchase orders and invoices necessary to verify the type and amount used.
 - (2) The VOC and HAP content (weight and volume percent) of each material used.
 - (3) The weight of VOCs and HAPs emitted for each compliance period, considering capture and destruction (or removal) efficiency.
 - (4) VOC and HAP control device and capture system operating parameter data for each month, such as:
 - (i) Capture efficiency;
 - (ii) Destruction (or removal) efficiency;
 - (iii) Data used to establish the capture and destruction (or removal) efficiencies; and
 - (iv) Temperature readings.

D.2.12 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system CC-1
Parameter: VOC
Limit: The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as CC-1, shall be limited to 81.96 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-1, that maintains a minimum overall control efficiency of 94.0%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system CC-1
Parameter: Single HAP and Total HAP
Limit: The total input of any single HAP and any combination of HAPs, including coatings, dilution solvents, and cleaning solvents, to the rollcoating paper coating application system, CC-1, shall be limited to 165 and 400 tons per twelve (12) consecutive month period, rolled on a monthly basis, respectively. HAP emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, TO-1, that maintains a minimum overall control efficiency of 94.0%.

YEAR: _____

Month	Worst-Case Single HAP Usage This Month (tons)	Total HAP Usage This Month (tons)	Worst-Case Single HAP Usage Previous 11 Months (tons)	Total HAP Usage Previous 11 Months (tons)	12 Month Worst-Case Single HAP Usage (tons)	12 Month Total HAP Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Colwell/General, Inc.
Source Address: 231 South Progress Drive East, Kendallville, Indiana 46755-3269
Mailing Address: P.O. Box 218, Kendallville, Indiana 46755-0218
Part 70 Permit No.: T113-6020-00019
Facility: rollcoating paper application system S-4
Parameter: VOC
Limit: The usage of VOC, including coatings, dilution solvents, and cleaning solvents, in the rollcoating paper coating application system, identified as S-4, shall be limited to 681.62 tons per twelve (12) consecutive month period, rolled on a monthly basis. VOC emissions from the rollcoating paper coating application system shall be controlled by the thermal oxidizer, identified as TO-2, that maintains a minimum overall control efficiency of 95.0%.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	VOC Usage This Month (tons)	VOC Usage Previous 11 Months (tons)	12 Month Total VOC Usage (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____